

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

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FILED

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AMERICAN UNIVERSITY OF ANTIGUA COLLEGE
OF MEDICINE, Plaintiff

U.S. DIST. COURT CLERK
United States District Court, E.D. MICH
Judge Patrick J. Duggan, presiding
Michael Hluchaniul, referral
Case No.: 2:10-cv-10978

V
Steven Woodward, Defendant

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Defendant's Response to Plaintiff's Motion to Strike(Docket 181)

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The Plaintiff's Motion to Strike(Docket 181) is in clear error and should be DENIED.

The Plaintiff claims that the Defendant has violated a page limit per Court Order (Docket 174) which is totally FALSE.

The Plaintiff failed to answer approximately 89% the Defendant's Requests for Admissions as required by FR 36. Court Order (Docket 174) page requirement was for briefs by both parties concerning the Plaintiff's failure to perform Discovery, which the Defendant filed in "Defendant's Objections to Order on Discovery Motions"(Docket 178), Section A, "Plaintiff's Response to Defendant's Request For Admissions"

The Plaintiff filed Docket 177, and Docket 179.

The Defendant's Docket 180 is a Reply to "AUA's Supplemental Response to Woodward's Motion for Sanctions"(Docket 177) and is just that; a Response to the Plaintiff's Docket 177.

Docket 180 is not a brief on the Plaintiff's failure to answer 89% of the Defendant's Requests for Admissions as required Discovery Material per Federal (and Local) Rules 26 and 36 per Court Order(Docket 174) and Court Order(124).

Defendant's Docket 180 is a Response to the Plaintiff's Supplement,(Docket 177), outside the scope of any page (or other) requirement.

Let's call the Plaintiff's "Request to Strike", (Docket 181) what it really is; a scheme to cover-up the facts.

FACT: (including but not limited to)

1. Susan Zonia was hired by both American University of Antigua, AUA, as faculty and St Joseph Mercy Oakland Hospital, SJMO, as Director of Medical Education. Susan Zonia was hired at SJMO in 2006 and **FIRED** in 2010 for unprofessional behavior.
2. St Joseph Mercy Oakland Hospital's Disciplinary Actions concerning Susan Zonia states "**failed to display professional leadership and judgment**".
3. Susan Zonia's admission to repeated use of profanity at work, such as: "**FUCK**", "**Blow Job**", and "**yank his dick**".
4. Confirmation of Susan Zonia's use of profanity at work in six(6) sworn affidavits.
5. Susan Zonia's Memo, dated December 17, 2007, is an artifice of Fraud, and blatant lies and false statements concerning Steven Woodward.
6. Susan Zonia threatened employees jobs, "if you don't" kind of, "do it my way, Woodward is right there." as testified by Ane McNeil.
7. The Plaintiff's (AUA, Susan Zonia, and SJMO) repeated filing of False Declarations and Documents to the Oakland County Circuit Court, Michigan Court of Appeals, and this United States District Court, including but not limited to, the Academic Performance and Professionalism of Steven Woodward.
8. That Oakland County Court Orders, Michigan Appeals Court Orders are based on lies and false statements and declarations made by AUA, St Joseph Mercy Oakland Hospital and Susan Zonia.
9. The fact that David Gunsberg, an employee of AUA, St Joseph Mercy Oakland Hospital, and Susan Zonia, is an admitted and convicted Kidnapper and performs other unlawful activities.

10. Most importantly, Oakland Circuit Court, Michigan Appeals Court, have used FALSE language in Orders to DESTROY Steven Woodward's family name, history, career, and future.

SHAME ON THESE COURTS AND JUDGES!

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A handwritten signature in black ink, appearing to read "Steve Woodward", with a large, sweeping loop at the end.